

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

No. 1:19-md-2875-RBK
Hon. Robert Kugler
Hon. Joel Schneider

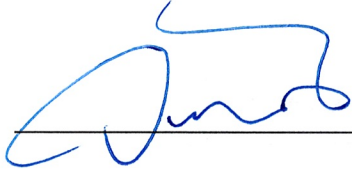
**DECLARATION OF
UNITEDLEX**

I, Dan Panitz, declare as follows:

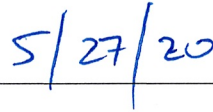
1. I am a Senior Vice President with the company UnitedLex, which has been retained by Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd. (collectively, “the Teva Defendants”) in the above-captioned matter.
2. At the request of counsel for the Teva Defendants, I prepared a cost estimate for review of documents in the custodial email files of 16 custodians, comparing the anticipated cost of review using the original search terms incorporated in the Court’s December 23, 2019 Order against the cost of review using the counterproposal search terms adopted by the Teva Defendants.
3. Assuming the following based on industry standards and experience: (1) a typical 30% responsive rate across the full review set; (2) a 30% redaction rate across the review set to account for potential Personal Information, HIPAA, Non-Responsive/Other Teva product redactions, and privilege redactions; and (3) a 25% privilege rate across the responsive production set encompassing privilege sweep, QC, and consistency review; the estimated cost of document review utilizing the original terms was \$3,708,500 and utilizing the

counterproposal terms was \$1,976,300, without accounting for increased processing and hosting costs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



Name (Signature)



Executed on

Dan Panitz

Name (Printed)